

**PITKIN COUNTY COMMENTS RE: ASPEN SKIING COMPANY ASPEN MOUNTAIN
IMPROVEMENTS - PANDORA DEVELOPMENT & SUMMIT SNOWMAKING PROJECTS**

June 12, 2018

General Pitkin County recognizes and appreciates Aspen Skiing Company's (ASC) efforts to ensure that they are offering guests and the visitors of the White River National Forest a high quality recreational experience by increasing snow-making capacity and improving access to the Pandora side-country terrain.

Climate Change ASC has historically promoted efforts to address climate change. In that spirit, we recommend that the Preliminary Environmental Analysis be modified as necessary to consider the energy consumption and greenhouse gas emissions associated with the water pump station, snowmaking apparatus and chairlift elements of the Proposed Action, relative to community goals for a reduction in energy use, related emissions and preservation of air quality, particularly in close proximity (within approximately 3.6 miles) to the Maroon Bells-Snowmass Wilderness Class 1 airshed. Proposed improvements should be designed to minimize fossil fuel energy consumption and greenhouse gas emissions to the greatest extent possible. Furthermore, we recommend that Aspen Skiing Company be required to fully off-set energy used to accommodate improvements and associated operations.

Water Related to climate change, the Preliminary Environmental Analysis should be modified to go beyond impacts to small drainages on Aspen Mountain, to consider impacts of increased snowmaking capacity on the overall watershed, including *minimum stream flows* on Castle and/or Maroon Creek, or any other potentially affected *water source*. While the Preliminary Analysis considers potential impacts of the new access road on a wetland, the Notice of Proposed Action does not indicate consideration of the broader implication of stream health on a watershed scale. Additionally, the County Engineer should be consulted regarding surface runoff resulting from the proposed expansion of snowmaking, to the extent that it affects ditches in the vicinity and/or Keno Gulch.

Wildlife Snowmaking capacity improvements may be a necessity to facilitate ongoing ski area operations, given climate-change related weather trends. However, modification of the ski permit boundary *to bring a chairlift, new access road, gladed and traditional run improvements into an area currently used as unimproved side-country terrain*, will increase winter use in an area where use has historically been moderated by limited access. The Preliminary Environmental Analysis indicates that the increase in overall use facilitated by the new lift towers, terminal station, and access road will likely affect Elk. Colorado Parks and Wildlife has indicated that Elk populations are in decline and that increased and year-round

recreation may be an influence on that decline. Some seasonal closures and/or time restrictions are anticipated to mitigate impacts.

Closures and restrictions are only effective if ongoing enforcement of said mitigation is required of the proponent. It is recommended that Aspen Skiing Company be responsible for funding ongoing assessment of wildlife impacts and implementation of adaptive management practices during and after construction to ensure that mitigation is effective. That said, once infrastructure is in place, it will be difficult to reverse any negative impacts that may result with respect to the declining Elk population and/or any other game or non-game species that may be affected.

Finally, please address the potential for increased summer use of Pandoras, (given improvement to access,) and implications to the elk population; and impacts of light and noise associated with additional snowmaking on elk;

Pitkin County Roads The Preliminary EA indicates that the Proposed Action will increase annual visitor numbers by +/- 400, but concludes that related impacts to County roads will be negligible because many visitors will be arriving via the Pitkin County Airport and Highway 82, rather than using County roads.

Prior to start of work, the Pitkin County Engineer should be consulted regarding the use of Summer Road, Little Annie Road and/or any County Roads/rights-of ways/easements for temporary, seasonal or permanent access, staging, hauling and construction purposes.

Mass Transit The proponent should be required to incentivize the use of mass transit to discourage the incremental and cumulative addition of traffic to Highway 82 resulting from increased annual visitors accessing improvements at both the Aspen Mountain and Snowmass Ski Areas. Require Aspen Skiing Company should also be required to provide funding for mass transit as needed to accommodate additional use of Aspen Mountain resulting from improvements.

Affordable Housing Mitigation Recognizing the cumulative impact of incremental development, require mitigation of affordable housing generated as a result of proposed improvements.

Construction Waste Recent County analysis indicates that construction waste consumes a significant amount of air space in the Pitkin County Landfill. It is recommended that any construction management plan include a requirement and specific methodology for reducing, re-purposing, or recycling waste to the greatest extent possible.

Pitkin County Review Required The Proposed Action will be subject to submittal of an application by ASC to Pitkin County to amend the Aspen Skiing Company's current Pitkin County Aspen Mountain Ski/Rec Master Development Plan. Given the mosaic of private and federal

lands within the Aspen Mountain Special Use Permit boundary and proposed amended boundary, the Proposed Action will be subject to several Pitkin County Land Use Code and Building Code provisions and/or permits. At a minimum, the ski area use and improvements on private lands for the Pandora expansion will be subject to approval of a change to County zoning of the area from the Rural/Remote zone district to the Ski/Rec zone district.